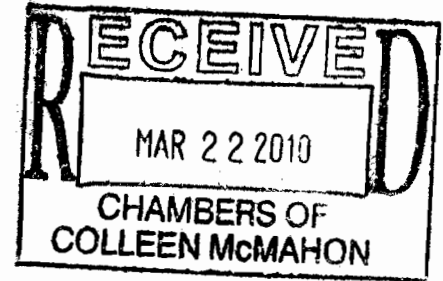


DAVIDOFF MALITO & HUTCHER LLP
 Attorneys for Atlas Exporters d/b/a Looms India
 605 Third Avenue
 New York, New York 10158
 (212) 557-7200 x3237
 Ralph E. Preite, Esq.



UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 Atlas Exporters,
 d/b/a Looms India,

08-Civ.7346 (CM)(DCF)

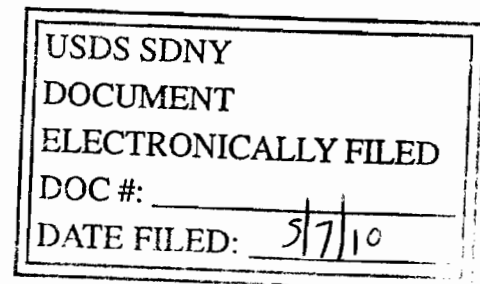
Plaintiff,

MEMO ENDORSED

-against-

ANI Industries LLC d/b/a Angilique,
 Habib American Bank,
 GeoLogistics Americas Inc.
 AllCargo Movers (India) PVT LTD.,
 Ritesh Mahtani, and
 Navine Mahtani,

Defendants.
 -----X



**NOTICE OF MOTION AND CONSOLIDATED MEMORANDUM OF LAW
 BY PLAINTIFF FOR DEFAULT JUDGMENT PURSUANT TO FEDERAL
 RULE OF CIVIL PROCEDURE 55 AGAINST DEFENDANTS ANI
 INDUSTRIES LLC D/B/A ANGILIQUE, ALLCARGO MOVERS (INDIA) PVT
 LTD, RITESH MAHTANI, AND NAVINE MAHTANI**

PLEASE TAKE NOTICE, that upon the annexed application (the "Motion"), Atlas Exporters d/b/a Looms India, plaintiff ("Plaintiff") by its attorneys, Davidoff Malito & Hutcher LLP, will move this Court before the Honorable Colleen McMahon, United States District Judge, at the United States District Court, United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date and time to be determined, for an order pursuant to Rule 55 of the Federal Rules of Civil Procedure for a judgment by default against each, ANI Industries LLC d/b/a Angilique, Allcargo Movers (India) PVT LTD, Ritesh Mahtani, and Navine Mahtani.

5/6/2010
 00401962

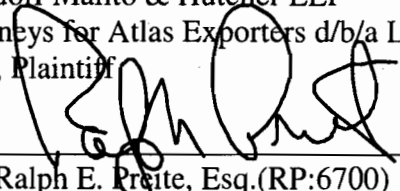
Motion granted. Please submit a form of judgment. Colleen McMahon

THE ATTACHED LEGAL PAPERS ARE BEING SERVED ON YOU BECAUSE YOU HAVE FAILED TO APPEAR IN A LAWSUIT BROUGHT AGAINST YOU. IF YOU DO NOT ENTER AN APPEARANCE IN THE LAWSUIT ON OR BEFORE MARCH 20, 2010, THE COURT WILL ENTER A DEFAULT JUDGMENT AGAINST YOU. IF YOU ARE A CORPORATION, YOU CAN ONLY APPEAR THROUGH AN ATTORNEY. IF YOU ARE AN INDIVIDUAL, YOU MAY APPEAR BY AN ATTORNEY OR PRO SE. IN EITHER EVENT, YOU MUST TAKE SOME ACTION OR A JUDGMENT WILL BE ENTERED AGAINST YOU. ENTRY OF A JUDGMENT MAY RESULT IN A LEVY AGAINST YOUR PROPERTY.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion must be made in writing stating the legal basis for the objection and must be filed, together with proof of service thereof, with the Clerk of the United States District Court, United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, together with a courtesy copy to the Chambers of the Honorable Colleen McMahon, and served on the undersigned attorney for the Plaintiff, no later than seven days after date of service of this Motion in accordance with Local Civil Rule 6.1.

Dated: New York, New York
March 17, 2010

Davidoff Malito & Hutcher LLP
Attorneys for Atlas Exporters d/b/a Looms
India, Plaintiff

By: 
Ralph E. Preite, Esq. (RP:6700)
605 Third Avenue
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(212) 557-7200

To: ANI Industries LLC d/b/a Angilique
1407 Broadway, Suite 921
New York, New York 10018

ANI Industries LLC d/b/a Angilique
1430 Broadway
New York, New York 10018

Allcargo Movers Inc.
200 Middlesex Turnpike
Iselin, New Jersey 08830